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**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

**CAREN EHRET, individually and on
 behalf of a class of similarly situated
 individuals,**

Plaintiff,

v.

**UBER TECHNOLOGIES, INC., a
 Delaware Corporation,**

Defendant.

Case No. 3:14-cv-113-EMC

**STIPULATION AND ~~PROPOSED~~ ORDER ON
 CONTENT OF CLASS NOTICE AND TIMELINE
 FOR SENDING NOTICE TO THE CLASS**

1 Pursuant to the Court's December 2, 2015 Order, the undersigned counsel of record for
2 Plaintiff Caren Ehret ("Plaintiff") and Defendant Uber Technologies, Inc. ("Defendant")
3 (collectively, the "Parties") stipulate and agree as follows:

4 **WHEREAS**, on December 2, 2015, the Court granted in part and denied in part
5 Plaintiff's motion for class certification and ordered the parties to meet and confer "regarding the
6 contents and logistics of class notice and other relevant procedural details" and to "stipulate to
7 form of class notice and a proposed timeline";

8 **WHEREAS**, the parties have conferred and have agreed upon the form of a class notice,
9 a copy of which is attached hereto, and a timeline for sending said notice to the class;

10 **IT IS HEREBY STIPULATED AND AGREED**, that the class notice attached hereto is
11 approved by the Court. The claims administrator shall send the class notice to all class members
12 via email within 60 days after the Court approves and enters this stipulation and order.

13 In accordance with Local Rule 5-1(i)(3), the filer of this document hereby attests that the
14 concurrence in the filing of this document has been obtained from the other signatories hereto.

15 Dated: January 7, 2016

16 MYRON M. CHERRY & ASSOCIATES LLC
17 JACIE C. ZOLNA (admitted *pro hac vice*)

18 By: /s/ Jacie C. Zolna
19 Jacie C. Zolna
Attorney for Plaintiff Caren Ehret

20 Dated: January 7, 2016

21 QUINN, EMANUEL, URQUHART & SULLIVAN, LLP
22 ARTHUR M. ROBERTS (SBN 275272)

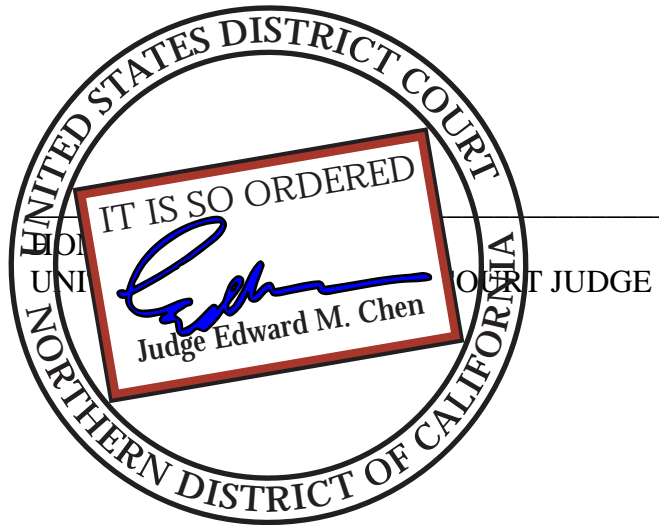
23 By: /s/ Arthur M. Roberts
24 Arthur M. Roberts
Attorney for Defendant
Uber Technologies, Inc.

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1 **PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.**

2
3 1/12/16

4 Dated: _____



Defendant.

Case No. 3:14-cv-113-EMC

This Notice is not intended to be, and should not be taken as, an expression of any opinion by the Court on the merits of the claims or defenses asserted in this case. Neither the

Court nor a jury has yet determined whether Plaintiff's claims, or Uber's defenses, are true. This Notice is merely sent to notify class members of the pendency of the case and the rights of all class members.

B. What is a class action lawsuit?

A class action lawsuit is a legal action in which one or more people represent a large group, or class of people. The purpose of a class action lawsuit is to resolve at one time similar legal claims of the members of the group.

C. What is the class in this case?

On December 2, 2015, the Court certified this case as a class action. The Court certified and defined the class as follows:

“All individuals who received Uber's e-mail with the representation that the 20% charge would be gratuity only, who then arranged and paid for taxi rides through Uber's service from April 20, 2012 to March 25, 2013.”

This lawsuit only relates to one of Uber's ride request options: uberTAXI. This lawsuit does not relate to UberBlack, uberX, or any other of Uber's ride request options.

D. What are your options?

If you believe you meet the class definition above, you have two options: (1) You can remain a member of the class; (2) You can request exclusion (“opt out”) of the class.

1. Remain in the class.

- a. If you are a member of the class and do not specifically request exclusion from the class in accordance with the procedure outlined below, you will automatically remain a member of the class. **Thus, you do not need to take any action at this time to remain a member of the class.**
- b. If you remain a member of the class, you will be represented by Plaintiff and court-appointed Class Counsel, unless you enter an appearance through counsel of your own choice and at your own expense. You are not required to obtain your own counsel. If you choose to do so, your counsel must file an appearance on your behalf and mail copies of such appearance to the attorneys listed in paragraph E below.
- c. If you remain a member of the class, you will be bound by any judgment in this case, whether favorable or unfavorable. As a member of the class you may share in the recovery, if any, and you will not have to prosecute your own claim. If judgment is entered in favor of Uber, the class will be denied any recovery.

- d. By remaining in the class, you will not subject yourself to any obligation to pay the costs of the case.

2. **Exclude yourself from the case, i.e., opt out of the class.**

- a. Any class member has the right to be excluded from the class by request. If you wish to exclude yourself from this case you must request, in writing by letter or email, to be excluded. All requests should include your name, address, email address, the case name (“Ehret v. Uber”) and a statement that you wish to be excluded from the class. This Request for Exclusion must be emailed or postmarked within 45 days of the date of this Notice (by **INSERT DATE**) and sent to the following address:

[Insert third-party administrator]

- b. If your timely Request for Exclusion is received by **[Insert third-party administrator]**, you will be excluded from the case, i.e., from the class. If excluded, you will not be bound by the results of the litigation and you will not be eligible to receive any portion of damages, if any, that may be awarded to the class.

E. Who are the lawyers for the Plaintiff?

The Court appointed Myron M. Cherry and Jacie C. Zolna of Myron M. Cherry & Associates, LLC, Hall Adams of the Law Offices of Hall Adams LLC and Michael Ram of Ram, Olson, Cereghino & Kopczynski LLP as Class Counsel. Class Counsel may work with other attorneys in prosecuting this case. Class Counsel (and any other attorneys working with them) are working on a contingency basis, which means they will be paid attorneys’ fees for their work only if the Plaintiff recovers, by settlement or otherwise, in this lawsuit. If the Plaintiff recovers, Class Counsel will be paid attorneys’ fees in a manner approved by the Court. If Plaintiff does not win or settle the case, Class Counsel will not be paid any attorneys’ fees.

Class Counsel:

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F. Where can you get more information about this lawsuit?

If you have any questions about the case, please submit your questions in writing to **[Insert third-party administrator]** or call them at **[Insert telephone number]**. For more details on the case, you may also examine the court file at the office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, California 94102. **PLEASE DO NOT CALL THE COURT CLERK'S OFFICE.**

Dated: _____

BY ORDER OF THE UNITED STATES DISTRICT COURT